

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 15-MJ-10271-WGY
)	
ALEX LEVIN,)	
)	
Defendant.)	

DISCOVERY PROTECTIVE ORDER

1. Pursuant to Federal Rule of Criminal Procedure 16(d), the government submits, and the defendant does not at this time contest, that good cause exists for the following protective order in regard to certain “sensitive” discovery in this case.
2. The government will make available copies of discovery materials, including those filed under seal, to defense counsel to comply with the government’s discovery obligations. Possession of copies of the discovery materials designated as “sensitive” is limited to the attorneys of record, as well as investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as “members of the defense team”).
3. The attorneys of record and members of the defense team may display and review the “sensitive” discovery materials covered by this order with the defendant. The attorneys of record and members of the defense team acknowledge that providing copies of the “sensitive” discovery material to the defendant and/or other persons is prohibited, and will not duplicate or provide copies of such materials to the defendant or other persons without prior approval from the court.

4. Nothing in this order shall be construed as imposing any discovery obligations on the government or defendant that are different from those imposed by case law, the Federal Rules of Criminal Procedure, and/or the Local Rules.
5. Any “sensitive” discovery material that is filed with the Court in connection with pre-trial motions, trial, sentencing, or other matters before this Court shall be filed under seal and shall remain sealed until otherwise ordered by this Court. This does not entitle either party to seal its filings as a matter of course; the parties are required to comply in all respects with the relevant local and federal rules pertaining to the sealing of court documents.
6. Any “sensitive” discovery materials provided pursuant to this Order shall be returned to the United States Attorney’s Office, including all copies and transcripts derived therefrom, within 10 days of the completion of the case before the Court.

SO STIPULATED:

ALEX LEVIN	ANDREW E. LELLING United States Attorney
By: <u>/s/ J.W. Carney, Jr.</u> J.W. Carney, Jr. Attorney for Alex Levin	By: <u>/s/ Anne Paruti</u> Anne Paruti Assistant U.S. Attorney

IT IS SO ORDERED.

<u>Honorable William G. Young</u> United States District Judge	Dated:
---	--------